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6  
7 UNITED STATES DISTRICT COURT  
8 NORTHERN DISTRICT OF CALIFORNIA

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10 IN RE: SOCIAL MEDIA ADOLESCENT  
11 ADDICTION/PERSONAL INJURY  
12 PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case No. 4:22-md-3047-YGR

13 This Document Relates to:

14 ALL ACTIONS

15 **DECLARATION OF MICHAEL**  
16 **WEINKOWITZ IN SUPPORT OF**  
17 **PLAINTIFFS' OPPOSITION TO**  
**TIKTOK'S OMNIBUS MOTION TO**  
**SEAL**

Judge: Hon. Yvonne Gonzalez Rogers

18 **DECLARATION OF MICHAEL WEINKOWITZ**

19 Pursuant to 28 U.S.C. § 1746, I, Michael Weinkowitz, declare as follows:

20 1. I am an attorney and partner at Levin Sedran & Berman LLP, and have been  
21 appointed by this Court in this MDL to the Plaintiff Leadership Committee and as Co-Chair of the  
22 School District Committee.

23 2. I make this Declaration under the penalty of perjury based on my own personal  
24 knowledge. If called upon to testify, I could and would testify competently to the truth of the matters  
25 stated herein.

26 3. Attached as **Exhibit A** is a true and correct excerpt of the transcript from the April  
27 22, 2024 discovery hearing in this case, held before Magistrate Judge Kang.  
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4. I attended the discovery hearing on April 22, 2024 in which counsel for the TikTok Defendants declared that employees had received “threats . . . because the public has found out that they’re working for the company[.]” **Exhibit A** at 47:23-48:3.

5. Attached as **Exhibit B** is a true and correct copy of an email I sent to counsel for the TikTok Defendants on April 22, 2024, asking for evidence substantiating counsel's claims during the April 22, 2024 hearing that TikTok employees received threats due to this case.

6. Attached as **Exhibit C** is a true and correct copy of an email I sent to counsel for the TikTok Defendants on April 24, 2024, following up on my request for evidence regarding the alleged threats.

7. Attached as **Exhibit D** is a true and correct copy of an email chain containing the April 29, 2024 email sent by Amy Fiterman, counsel for the TikTok Defendants, responding to my request for evidence, stating “We are under no obligation to document this [harassment] to you and your colleagues.”

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on December 17, 2025

By: /s/ Michael Weinkowitz  
Michael Weinkowitz  
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